

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

BROAD-BUSSEL FAMILY LIMITED	:	
PARTNERSHIP, MARIE LOUISE	:	
MICHELSON, MICHELLE MICHELSON,	:	CASE NUMBER:
and HERBERT BLAINE LAWSON, JR.,	:	3:05 CV 1762 (JBA)
Individually and on Behalf of All Other	:	
Persons and Entities Similarly Situated,	:	
	:	
Plaintiffs,	:	
	:	
vs.	:	
	:	
BAYOU GROUP LLC, et al.,	:	
	:	
Defendants.	:	

**MOTION TO ADMIT  
FOREIGN COUNSEL PRO HAC VICE**

In accordance with D. CONN. L. CIV. R. 83.1(d), the undersigned attorney, duly admitted to practice before this Court, hereby moves that Mark B. Blocker, Esq., be permitted to represent defendant Citibank, N.A. in the above-captioned action for all matters related to this case, in addition to counsel of record who have already appeared for the defendant. Mark B. Blocker, Esq., is an attorney admitted to practice before the state court of Illinois, as well as numerous other federal appellate and district courts (as set forth in greater detail in the attached Affidavit). In support of this motion, the undersigned states:

1. Mark B. Blocker is a member of the law firm of Sidley Austin LLP, One South Dearborn Street, Chicago, Illinois 60603.
2. An affidavit setting forth the necessary information regarding the qualifications of Mark B. Blocker, Esq., to practice before this Court along with such other information required by D. CONN. L. CIV. R. 83.1(d) is attached hereto as Exhibit A and made a part hereof.

3. The undersigned has agreed to act as local counsel for Citibank, N.A. in this proceeding and, as such, agrees to be the Connecticut recipient of all pleadings and communications on behalf of defendant Citibank, N.A. All pleadings and communications may be sent to Gates Garrity-Rokous at the following address and telephone number:

Gates Garrity-Rokous  
Wiggin and Dana LLP  
One Century Tower  
264 Church Street  
New Haven, CT 06508-1832  
Telephone: (203) 498-4310  
Facsimile: (203) 782-2889  
E-mail: ggr@wiggin.com

Respectfully submitted,

CITIBANK, N.A.

By: 

Gates Garrity-Rokous CT-15218  
Wiggin and Dana LLP  
One Century Tower  
264 Church Street  
New Haven, CT 06508-1832  
Telephone: (203) 498-4310  
Facsimile: (203) 782-2889  
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Plaintiffs,	:	
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vs.	:	
	:	
BAYOU GROUP LLC, et al.	:	
	:	
Defendants.	:	

**AFFIDAVIT IN SUPPORT OF MOTION  
FOR PERMISSION TO APPEAR PRO HAC VICE**

STATE OF ILLINOIS    )  
                              ) ss.  
COUNTY OF COOK    )

MARK B. BLOCKER, being duly sworn, hereby deposes and says:

1. I am over the age of eighteen (18) years and I understand the nature and obligations of an oath.
2. I am a partner in the law firm of Sidley Austin LLP and may be reached through the following contact information:

Mark B. Blocker  
Sidley Austin LLP  
One South Dearborn Street  
Chicago, IL 60603  
Telephone: (312) 853-7000  
Facsimile: (312) 853-7036  
E-mail: mblocker@sidley.com

3. I submit this affidavit in support of a motion to be admitted to practice before this Court in the above-captioned matter as a visiting attorney *pro hac vice* pursuant to D. CONN. L. CIV. R. 83.1(d).

4. I am a member in good standing of the bar of the State of Illinois (and have been since 1988). I am also admitted and in good standing in the following courts:

- U.S. Court of Appeals, 5th Circuit, 2000
- U.S. Court of Appeals, 7th Circuit, 1998
- U.S. Court of Appeals, 10th Circuit, 1997
- U.S. District Court, N.D. of Illinois – General, 1988
- U.S. District Court, N.D. of Illinois – Trial Bar, 1996
- U.S. District Court, C.D. of Illinois, 2000
- U.S. District Court, S.D. of Illinois, 2003
- U.S. District Court, E.D. of Wisconsin, 1999.

5. I have not been denied admission or disciplined by this Court or any other Court.

6. I have fully reviewed and I am familiar with the Rules of the United States District Court for the District of Connecticut.

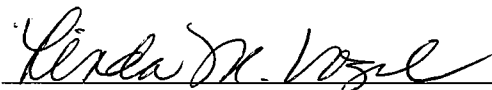
7. The granting of this motion will not require modification of any scheduling order entered by this Court pursuant to FED. R. CIV. P. 16(b) or the standing order on scheduling in civil cases.

8. I have requested that Gates Garrity-Rokous, Esq., of the firm of Wiggin and Dana LLP, One Century Tower, 265 Church Street, New Haven, CT 06508-1832, act as local counsel, and I understand that he will be receiving service of papers and communications in this matter with me on behalf of defendant Citibank, N.A.



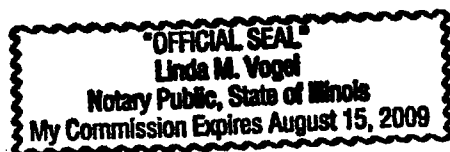
Mark B. Blocker

Subscribed and sworn to before me this  
12<sup>th</sup> day of January, 2006.



Notary Public

My Commission expires:



**CERTIFICATION**

This is to certify that a true and correct copy of the foregoing was delivered by  
United States mail, postage prepaid, to the following this 13<sup>th</sup> day of January, 2006:

Lane L. Vines, Esq.  
Merrill G. Davidoff, Esq.  
Lawrence J. Lederer, Esq.  
Berger & Montague, PC  
1622 Locust Street  
Philadelphia, PA 19103

William M. Bloss, Esq.  
Koskoff, Koskoff & Bieder, PC  
350 Fairfield Avenue  
Bridgeport CT 06604

Patrick J. McHugh, Esq.  
William Morten Tong, Esq.  
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One Landmark Square  
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Sung-Hee Suh, Esq.  
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New York, NY 10022

Lawrence E. Fenster, Esq.  
Matthew Plant, Esq.  
Bressler Amery & Ross  
17 State Street  
New York, NY 10004

Marc J. Grenier, Esq.  
DePanfilis & Vallerie LLC  
25 Belden Avenue  
PO Box 699  
Norwalk, CT 06852-0699

A handwritten signature in black ink, appearing to read 'Gates Garrity-Rokous', written over a horizontal line.

Gates Garrity-Rokous